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VIA ECF

Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS") (collectively, the "City Defendants") in the above-referenced matter. The Complaint alleges that from January 2021 until August 2023, based on false reports of child neglect and abuse, ACS unlawfully conducted several investigations of Plaintiff L.B.¹ I write to respectfully request that the Court grant the individual defendants a third, 21-day, extension of time to respond to Plaintiffs' pending motion to proceed anonymously (the "Motion") *sua sponte*.²

I am seeking this extension of the individual defendants' time to respond to the Motion as I am still working to complete representation interviews in connection with this office's assessment of whether it will represent the individual defendants in this litigation. Accordingly, I respectfully request that the Court extend the individual defendants' deadline to respond to the

¹ In addition to the City Defendants, the Complaint names as individual defendants Ariel Semper; Nadine Cenord; Bernadet Jean-Louis; Donna McFadden; Ana Costa; Taiesha Coleman; and Leydi Taveras.

² Defendants were originally directed to respond to the Motion by December 19, 2023. The City Defendants consented to the Motion on December 28, 2023. *See* ECF No. 24.

Motion until February 12, 2024, to allow for the completion of the representation interview process.

I contacted Plaintiffs' counsel via email this afternoon to ask whether Plaintiffs would consent to this request. I have not received Plaintiffs' position and Plaintiffs' counsel may not have had an opportunity to respond yet. I note, however, that the extension would not prejudice Plaintiffs because Plaintiffs will remain anonymous while the Motion remains pending.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez
Assistant Corporation Counsel